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August 1, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket 94-102
E911 Quarterly Report
Rural Cellular Corporation for itself and its affiliates

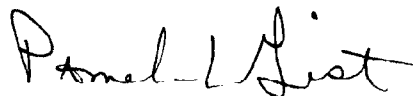
Dear Ms. Dortch:

On behalf of Rural Cellular Corporation and its subsidiaries¹ (collectively, "RCC") there is submitted herewith a report the status of the company's implementation of E911 services.

RCC is a digital wireless carrier operating cellular radiotelephone and/or personal communications services in multiple markets. RCC is a Tier II carrier as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 2002 FCC LEXIS 3638, FCC 02-210 (2002) ("*Phase II Stay Order*"). This report is submitted in compliance with the terms of the *Phase II Stay Order*.

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,



Pamela L. Gist

^{1/} This report pertains to the following companies which are wholly-owned subsidiaries of Rural Cellular Corporation and are authorized by the FCC to provide broadband Commercial Mobile Radio Service: RCC Atlantic, Inc., RCC Holdings, Inc., RCC Minnesota, Inc., Wireless Alliance, LLC and TLA Spectrum, L.L.C.

Rural Cellular Corporation E911 Implementation Report August 1, 2003

Summary

Rural Cellular Corporation ("Rural Cellular") has made considerable progress in the past three months regarding both Phase 1 and Phase 2 deployments. In several states we are near complete deployment of Phase 1 and our Phase 2 deployments are well underway. Unfortunately, Rural Cellular has serious concerns about our ability to achieve FCC compliant accuracy with a rural network-based Phase 2 solution.

As we have discussed in past reports, the deployment of wireless location services has been a fluid process for Rural Cellular, as we attempt to embrace these services in the rapidly changing wireless landscape. Rural Cellular has migrated from a plan to deploy handset solutions early last year, to the actual deployment of a network-based solution in three states in early 2003. The lack of TDMA handsets with GPS functionality for Rural Cellular's predominately TDMA networks has compelled our decision to deploy a network-based solution. Although we are relatively comfortable that we can meet the first 50% benchmark for Phase 2, it now appears unrealistic that we can achieve 100% Phase 2 compliance in our rural areas with the network-based technology.

Unlike many carriers serving more metropolitan areas, that have chosen a network-based solution, Rural Cellular's markets do not have the population density to allow the averaging of our rural serving areas (RSA) with metropolitan serving areas (MSA) to achieve the mandated accuracy. In light of these circumstances, Rural Cellular is faced with a daunting decision: continue to deploy a network-based solution for Phase 2, knowing that full compliance is not likely to be achieved or migrate to a handset-based solution. The handset-based solution would involve a complete overlay or conversion of our TDMA networks to CDMA/aGPS technology, or possible GSM should a GSM/aGPS handset become available. This network migration would place an enormous financial burden on our organization given the December 2005 deadline for aGPS handset sales and replacement.

With these challenges in mind, Rural Cellular encourages the FCC to consider either relaxed accuracy standards for rural service areas (RSAs) and/or extended timelines for TDMA carriers to migrate to networks that support GPS handsets. In spite of these challenges, Rural Cellular will continue in our good faith efforts to meet our Phase 2 responsibilities.

Network Based Solution:

As mentioned, Rural Cellular is deploying a network-based solution, provided by Grayson Wireless, which utilizes a complex triangulation method to approximate the location of a 911-wireless caller. Grayson requires the installation of additional equipment, power and data circuits at each cell to gather data from the call. In general, most sites will utilize the Time Difference of Arrival (TDOA) data to determine the handset's location. However Grayson has recommended large and cumbersome Angle of Arrival (AOA) antennas at roughly 20% of our sites where there is no third point of reference for the triangulation calculation. These AOA antennas provide the angle of the signal that is transmitted by the handset, providing the critical third reference point. After substantial review of Rural Cellular's cell sites and tower locations, numerous challenges have surfaced in our attempts to deploy these AOA antennas. In most instances the tower will not support the additional weight of the AOA antennas and the necessary cables to connect to the antennas. In some cases the installation of AOA antennas would be delayed or blocked by state environmental review or local zoning boards. For example, recently in Vermont a request to add antennas to an existing structure was delayed for over three years due to local zoning battles. These additional obstacles result in substantial financial and regulatory burden on Rural Cellular in our attempts to comply with the mandate. Rural Cellular has installed Grayson equipment in all of the areas where we have Phase 2 requests. The accuracy data compiled in these states will determine the long-term viability of a network-based solution in Rural Cellular's non-urban markets.

Status of Phase 1 Requests:

Vermont: Rural Cellular has completed the Phase 1 requirements in the state of Vermont.

Maine: Rural Cellular has voluntarily entered into a Phase 1 "beta-test" in the state of Maine. The state's Emergency Services Communications Bureau has coordinated the Phase 1 trial in Lincoln County. After a considerable amount of effort by all of the stakeholders, we are pleased to declare that the system was turned up on July 29th.

Minnesota: Since the last filing, Rural Cellular has been focused on our Phase 2 deployments in Minnesota. At this point many of the counties have been cutover to Phase 1. In the remaining counties where we have not deployed Phase 1, we will likely bypass Phase 1 with Phase 2 as soon as the addressing and call routing are completed. The state has accelerated the official addressing and routing process, which has greatly reduced some of the deployment delays. In three other counties Rural Cellular has a partnership with T-mobile, under which the network elements are shared. This relationship has complicated the deployment process due to routing issues. In all of these

instances, Rural Cellular is confident that progress is being made and we expect to complete deployment in the state of Minnesota in the near future.

Alabama: At this point most of the counties in Alabama that requested Phase 1 services have been tested and are in service. In the remaining counties, Rural Cellular is waiting for resolution of either database connection problems, challenges with the local telephone company and/or PSAP. We will be re-testing Talladega county in the next few days, but we are still awaiting a connection to the standalone ALI's at the Covington and Coffee Cty/Enterprise PSAP's in order to proceed with their Phase 1 deployments.

Oregon: Rural Cellular is working to complete the Phase 1 deployments of Harney and Lake counties in the coming weeks.

Washington: Rural Cellular has completed Phase 1 deployments in most of our serving area in the state of Washington. We expect to complete the remaining counties in the next few weeks.

Massachusetts: Rural Cellular has received a Phase 1 request for the commonwealth of Massachusetts. After extensive delays in the LEC acceptance process of our trunking proposal we are proceeding toward implementation. The trunks have since been ordered and we hope to schedule our Phase 1 cutover in the early September timeframe.

Mississippi: Rural Cellular has received five requests for Phase 1 service from counties in the state of Mississippi. We did experience some delays as we tried to determine the preferred database, trunking and call routing plan. At this point we have trunks on order and we intend to deploy Phase 1 in the next month.

New York: Rural Cellular has received a Phase 1 request from Clinton County and we have issued trunking orders to start the Phase 1 implementation process.

North Dakota: Rural Cellular recently received a Phase 1 request from the State of North Dakota. North Dakota is slated for installation of Phase 1 in the December timeframe.

Kansas: Rural Cellular has not received a Phase 1 request from the State of Kansas.

Wisconsin: Rural Cellular has not received a Phase 1 request from the State of Wisconsin.

South Dakota: Rural Cellular has not received a Phase 1 request from the State of South Dakota.

Status of Phase 2 Requests

Minnesota: Rural Cellular has received a request from the state of Minnesota's 911 administrator to provide Phase 2 services. Rural Cellular has two networks operating in the state of Minnesota, one a TDMA network, and the second a GSM network. Rural Cellular has deployed a Grayson network-based solution in both networks and we are coordinating testing/cutover with the state. The actual cutover process has proved challenging as we attempt to integrate the 40 plus PSAP's in our serving areas. Difficulties in coordination of PSAP's, ALI providers, LEC's, Grayson, mapping providers and RCC personnel have slowed the process. At the current pace we should complete the Phase 2 integrations in September. As discussed previously, Rural Cellular has not deployed the AOA antennas in the initial part of our Phase 2 deployment. Due to the difficulty in deploying the AOA antennas, Rural Cellular will postpone their deployment until a future date. Preliminary computer models of the accuracy without the AOA antennas indicate that we may fall short of the accuracy required.

Vermont: Rural Cellular has fully integrated the Grayson equipment to meet the first benchmark of 50% for Phase 2 compliance in the state of Vermont. Due to the sparse cell site placement and rugged terrain in Vermont, our vendor has recommended the deployment of AOA antennas. The AOA antennas present a difficult challenge in Vermont due to the lengthy zoning and permit process required to modify cell sites. At this point our vendor has confirmed that in the absence of AOA antennas it is unlikely that we will meet the 100% Phase 2 accuracy threshold. Rural Cellular has presented this limitation to the Vermont Enhanced Emergency 911 Board and we will be working to improve the accuracy to the best of our abilities.

Alabama: Rural Cellular has received two requests for Phase 2 services from Alabama counties within our service area. Rural Cellular has deployed the Grayson equipment on the few cell sites that we have in the area. We are currently live in Lamar County and our Fayette county integration has been delayed as the PSAP upgrades its ALI connection. Once again we are concerned about the accuracy that is reasonably attainable in our rural areas with the network-based technology.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
137	Bibb	AL	Bibb	1	TDMA	6/26/00			Y	12/5/02			
142	Butler	AL	Butler	1	TDMA	10/10/00			Y	3/30/03			
143	Calhoun	AL	Calhoun	1	TDMA	No Phase I request			Y	10/31/02			
145	Chambers	AL	Chambers	1	TDMA	7/11/00			Y	10/30/02			
149	Chilton	AL	Chilton	1	TDMA	12/13/00			Y	1/17/03			
151	Choctaw	AL	Choctaw	1	TDMA	6/21/99			Y	1/17/03			
155	Clay	AL	Clay	1	TDMA	7/26/00			Y	1/17/03			
157	Cleburne	AL	Cleburne	1	TDMA	2/25/00			Y	10/31/02			
158	Coffee	AL	Coffee - County	1	TDMA	2/2/01			Y	4/10/03			
177	Enterprise	AL	Coffee - Enterprise	1	TDMA	2/2/01					11/01/2003	2	Waiting for PSAP's Standalone ALI
161	Coosa	AL	Coosa		TDMA	No Phase I request							
162	Covington	AL	Covington	1	TDMA	10/10/00					12/1/03	2	PSAP equipment need upgrades
164	Crenshaw	AL	Crenshaw	1	TDMA	2/2/01			Y	3/20/03			
169	Dallas	AL	Dallas	1	TDMA	11/3/99			Y	12/5/02			
184	Fayette	AL	Fayette	2	TDMA	11/17/99			Y	5/20/03			
194	Geneva County	AL	Geneva County	1	TDMA	10/17/00			Y	4/10/03			
198	N/A	AL	Greene	1	TDMA	No Phase I request			Y	1/17/03			
201	Hale	AL	Hale	1	TDMA	5/11/99			Y	1/17/03			
217	Lamar	AL	Lamar	2	TDMA	11/15/00			Y	4/30/03			
228	Lowndes	AL	Lowndes	1	TDMA	1/25/01			Y	1/24/03			
231	Marengo	AL	Marengo	1	TDMA	8/14/00			Y	1/17/03			
233	N/A	AL	Perry		TDMA	No Phase I request				N/A			
257	Pickens	AL	Pickens	1	TDMA	7/17/00			Y	1/17/03			
258	Pike	AL	Pike	1	TDMA	5/12/03			Y	7/17/03			
261	Randolph	AL	Randolph	1	TDMA	3/1/01			Y	1/17/03			
268	Sumter	AL	Sumter	1	TDMA	8/14/00			Y	1/17/03			
271	Talladega	AL	Talladega	1	TDMA	7/9/99					9/1/03	6	Re-testing/cutover imminent
272	Tallapoosa	AL	Tallapoosa	1	TDMA	9/1/99			Y	10/31/02			
285	Wilcox	AL	Wilcox	1	TDMA	7/15/00			Y	1/17/03			
2713		KS	Cheyenne		TDMA	No Phase I requests							
2814		KS	Rawlins		TDMA	No Phase I requests							
2723		KS	Decatur		TDMA	No Phase I requests							
		KS	Sherman		TDMA	No Phase I requests							
2846		KS	Thomas		TDMA	No Phase I requests							
		KS	Sheridan		TDMA	No Phase I requests							
2796		KS	Norton		TDMA	No Phase I requests							
2808		KS	Phillips		TDMA	No Phase I requests							
		KS	Smith		TDMA	No Phase I requests							
2741		KS	Graham		TDMA	No Phase I requests							
2818		KS	Rooks		TDMA	No Phase I requests							
2802		KS	Osborne		TDMA	No Phase I requests							
2850		KS	Wallace		TDMA	No Phase I requests							
2744		KS	Greely		TDMA	No Phase I requests							
		KS	Logan		TDMA	No Phase I requests							
2740		KS	Gove		TDMA	No Phase I requests							
2853		KS	Wichita		TDMA	No Phase I requests							
		KS	Scott		TDMA	No Phase I requests							
2826		KS	Lane		TDMA	No Phase I requests							
2847		KS	Trego		TDMA	No Phase I requests							
		KS	Ellis		TDMA	No Phase I requests							
		KS	Russell		TDMA	No Phase I requests							
2794		KS	Ness		TDMA	No Phase I requests							
2819		KS	Rush		TDMA	No Phase I requests							
2703		KS	Barton		TDMA	No Phase I requests							
2807		KS	Pawnee		TDMA	No Phase I requests							
2746		KS	Hamilton		TDMA	No Phase I requests							
2763		KS	Kearny		TDMA	No Phase I requests							
2738		KS	Finney		TDMA	No Phase I requests							
2842		KS	Stanton		TDMA	No Phase I requests							
2742		KS	Grant		TDMA	No Phase I requests							
2749		KS	Haskell		TDMA	No Phase I requests							
2790		KS	Morton		TDMA	No Phase I requests							

2843		KS	Stevens		TDMA	No Phase I requests							
2829		KS	Seward		TDMA	No Phase I requests							
2751		KS	Hodgeman		TDMA	No Phase I requests							
2743		KS	Gray		TDMA	No Phase I requests							
2733		KS	Ford		TDMA	No Phase I requests							
2785		KS	Meade		TDMA	No Phase I requests							
2714		KS	Clark		TDMA	No Phase I requests							
2727		KS	Edwards		TDMA	No Phase I requests							
2841		KS	Stafford		TDMA	No Phase I requests							
2766		KS	Kiowa		TDMA	No Phase I requests							
2813		KS	Prairie		TDMA	No Phase I requests							
2720		KS	Comanche		TDMA	No Phase I requests							
2702		KS	Barber		TDMA	No Phase I requests							
3179	State of MA	MA	Franklin	1	TDMA	1028-02				9/1/03	1	Awaiting circuit installations	
3270		ME	Arcoostook		TDMA	No Phase I requests							
3282		ME	Piscataquis		TDMA	No Phase I requests							
3291		ME	Somerset		TDMA	No Phase I requests							
3280		ME	Penobscot		TDMA	No Phase I requests							
3296		ME	Waldo		TDMA	No Phase I requests							
3282		ME	Knox		TDMA	No Phase I requests							
3264	State Phase I Beta Test	ME	Lincoln	1	TDMA	No Phase I requests		Y	7/29/03				
3258		ME	Kennebec		TDMA	No Phase I requests							
3287		ME	Sagadahoc		TDMA	No Phase I requests							
3251		ME	Cumberland		TDMA	No Phase I requests							
3304		ME	York		TDMA	No Phase I requests							
3279		ME	Oxford		TDMA	No Phase I requests							
3253		ME	Franklin		TDMA	No Phase I requests							
3596	Aitkin	MN	Aitkin	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3600	Becker	MN	Becker	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3601	Beltrami	MN	Beltrami	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3603	Big Stone	MN	Big Stone	2	TDMA	2/1/01		Y	7/31/03	9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3610	Carlton	MN	Carlton	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3612	Cass	MN	Cass	2	TDMA	2/1/01		Y	7/24/03				
3616	Clearwater	MN	Clearwater	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3620	Crow Wing	MN	Crow Wing	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3623	Douglas	MN	Douglas	2	TDMA	2/1/01		Y	6/27/03				
3633	Grant	MN	Grant	2	TDMA	2/1/01		Y	7/14/03				
3640	Hubbard	MN	Hubbard	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3642	Isanti	MN	Isanti	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3643	Itasca	MN	Itasca	2	TDMA	2/1/01		Y	7/7/03				
3645	Kanabec	MN	Kanabec	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3647	Kinton	MN	Kinton	2	TDMA	2/1/01		Y	7/24/03				
3648	Koochiching	MN	Koochiching	2	TDMA	2/1/01		Y	7/24/03				
3651	Lake of the Woods	MN	Lake of the Woods	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3659	Mahnomen	MN	Mahnomen	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3681	Marshall	MN	Marshall	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3667	Mille Lacs	MN	Mille Lacs	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3685	Morrison	MN	Morrison	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3691	Norman	MN	Norman	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3695	Otter Tail	MN	Otter Tail	2	TDMA	2/1/01		Y	7/31/03				
3697	Pennington	MN	Pennington	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3698	Pine	MN	Pine	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3701	Pope	MN	Pope	2	TDMA	2/1/01		Y	7/24/03				
3704	Red Lake	MN	Red Lake	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3711	Roseau	MN	Roseau	2	TDMA	2/1/01		Y	7/24/03				
3723	Stevens	MN	Stevens	2	TDMA	2/1/01		Y	7/24/03				
3724	Swift	MN	Swift	2	TDMA	2/1/01		Y	7/31/03				
3726	Todd	MN	Todd	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3727	Traverse	MN	Traverse	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3730	Wadena	MN	Wadena	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3737	Wilkin	MN	Wilkin	2	TDMA	2/1/01				9/15/03	6	Phase 2 equipment deployed, awaiting testing	
3716	St. Louis	MN	St. Louis	2	GSM	2/1/01				10/15/03	6	Phase 2 equipment deployed, awaiting testing	
3615	Clay	MN	Clay	2	GSM	2/1/01				10/15/03	6	Phase 2 equipment deployed, awaiting testing	
3700	Polk	MN	Polk	2	GSM	2/1/01				10/15/03	6	Phase 2 equipment deployed, awaiting testing	

3715	Stearns	MN	Stearns	1	TDMA	2/1/01					10/15/03	6	Phase 1 addressing being verified
4099	Tunica	MS	Tunica		TDMA	No request							
4096	Tate	MS	Tate		TDMA	No request							
4051	Marshall	MS	Marshall	1	TDMA	10/23/02					9/1/03	1	Trunks ordered, awaiting delivery
3990	Coahoma	MS	Coahoma	1	TDMA	12/26/02					9/1/03	1	Trunks ordered, awaiting delivery
4081	Quitman	MS	Quitman		TDMA	No request							
4068	Panola	MS	Panola	1	TDMA	10/22/02					9/1/03	1	Trunks ordered, awaiting delivery
4032	Lafayette	MS	Lafayette		TDMA	No request							
3976	Bolivar	MS	Bolivar		TDMA	No request							
4094	Sunflower	MS	Sunflower		TDMA	No request							
4095	Tallahatchie	MS	Tallahatchie		TDMA	No request							
4042	Leflore	MS	Leflore	1	TDMA	10/17/02					9/1/03	1	Trunks ordered, awaiting delivery
3980	Carroll	MS	Carroll		TDMA	No request							
4017	Holmes	MS	Holmes		TDMA	No request							
4109	Yalobusha	MS	Yalobusha	1	TDMA	4/1/03					9/1/03	1	Trunks ordered, awaiting delivery
	Grenada	MS	Grenada		TDMA	No request							
3978	Calhoun	MS	Calhoun		TDMA	No request							
	Chickasaw	MS	Chickasaw		TDMA	No request							
	Monroe	MS	Monroe		TDMA	No request							
	Clay	MS	Clay		TDMA	No request							
4503	Cass County Sheriff	ND	Cass	1	GSM	6/27/03					12/27/03		
4546	Trails City Sheriff	ND	Trails	1	GSM	6/27/03					12/27/03		
4512	Grand Forks City PSAP	ND	Grand Forks	1	GSM	6/27/03					12/27/03		
4670	NH Bureau of Emergency Comm	NH	Merrimack/Statewide	1	TDMACDMA	2/1/03					9/1/03	6	Trunks ordered, awaiting delivery
5056	Clinton City PSAP	NY	Clinton	1	TDMA	4/14/03					9/1/03		Trunks ordered, awaiting delivery
5075	Essex City PSAP	NY	Essex		TDMA	No request							
5078	Franklin City PSAP	NY	Franklin		TDMA	No request							
5082	Fulton City PSAP	NY	Fulton		TDMA	No request							
5094	Hamilton City PSAP	NY	Hamilton		TDMA	No request							
5756	Baker Co SO	OR	Baker Co SO	1	TDMA	Prior to April 2000		Y		4/19/03			
5770	Corvallis Regional Comm Ctr - Benton Co	OR	Corvallis Regional Comm Ctr - Benton Co	1	TDMA	Prior to April 2000		Y		5/23/02			
5822	Prineville	OR	Crook	1	TDMA	Prior to April 2000		Y		4/10/03			
5774	Deschutes	OR	Deschutes	1	TDMA	Prior to April 2000		Y		1/23/03			
5785	Grant	OR	Grant		TDMA	No request							
5759	Harney	OR	Harney	1	TDMA	Prior to April 2000					10/1/03	6	Trunks ordered, awaiting delivery
5781	Hermiston PD	OR	Hermiston PD	1	TDMA	Prior to April 2000		Y		2/6/03			
5788	Klamath	OR	Klamath	1	TDMA	Prior to April 2000		Y		8/29/02			
5790	Lake	OR	Lake	1	TDMA	No request					10/1/03	6	Trunks ordered, awaiting delivery
5795	Lincoln	OR	Lincoln	1	TDMA	Prior to April 2000		Y		8/14/02			
5796	Linn County Sheriff's Office	OR	Linn County Sheriff's Office	1	TDMA	Prior to April 2000		Y		5/23/02			
5834	Toledo PD	OR	Toledo PD	1	TDMA	Prior to April 2000		Y		8/14/02			
5801	Umatilla Co SO	OR	Umatilla Co SO	1	TDMA	Prior to April 2000		Y		4/10/03			
5838	Union	OR	Union		TDMA	No request							
5839	Wallowa	OR	Wallowa		TDMA	No request							
6126		SD	Clark		TDMA	No Phase 1 requests for SD							
6197		SD	Codington		TDMA	No Phase 1 requests for SD							
6130		SD	Day		TDMA	No Phase 1 requests for SD							
6131		SD	Deuel		TDMA	No Phase 1 requests for SD							
6139		SD	Grant		TDMA	No Phase 1 requests for SD							
		SD	Hamlin		TDMA	No Phase 1 requests for SD							
6157		SD	Lincoln		TDMA	No Phase 1 requests for SD							
6160		SD	Marshall		TDMA	No Phase 1 requests for SD							
6167		SD	Minnehaha		TDMA	No Phase 1 requests for SD							
6180		SD	Roberts		TDMA	No Phase 1 requests for SD							
7242	Vermont State E911 System	VT	Vermont State Enhanced 911 Board	2	TDMA			Y		7/7/03			
7244	Asotin City Dispatch Center	WA	Asotin	1	TDMA	12/2/02		Y		6/30/03			
7253	Chelan City Sheriff's Office	WA	Chelan	1	TDMA	12/2/02					8/15/03	6	Installed awaiting testing
7258	Columbia City Sheriff's Office	WA	Columbia	1	TDMA	11/1/02		Y		6/30/03			
7263	Douglas City Sheriff's Office	WA	Douglas	1	TDMA	10/24/02					8/15/03	6	Installed awaiting testing

Appendix B

7266	Ferry City E 9-1-1	WA	Ferry	1	TDMA	12/2/02					8/15/03	6	installed awaiting testing
7278	Garfield City Sheriff's Office	WA	Garfield	1	TDMA	10/25/02			Y	6/30/03			
7324	Okanogan City Sheriff's Office	WA	Okanogan	1	TDMA	10/31/02			Y	6/30/03			
7329	Isle Police Dept.	WA	Pend Oreille	1	TDMA	11/8/02			Y	6/30/03			
7359	Steven City Dept of Emergency Services	WA	Stevens	1	TDMA	12/10/02					8/15/03		installed awaiting testing
7373	Walla Walla Emergency Serv. Comm.	WA	Walla Walla	1	TDMA	9/ 1/02			Y	6/30/03			
7384	Whitton	WA	Whitman	1	TDMA	4/4/02			Y	6/30/03			
7419		WI	Douglas County		GSM	No Phase 1 requests for WI							

AFFIDAVIT

County of Douglas

:

:

SS

State of Minnesota

:

I, SCOTT DONLEA, having been first duly sworn, depose and state as follows:

1. I am Vice President – Market Development for Rural Cellular Corporation.
2. I am familiar with the facts contained in the foregoing Quarterly Report of Phase-In of E911 Phase II Compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Scott Donlea

Scott Donlea

Vice President – Market Development
Rural Cellular Corporation

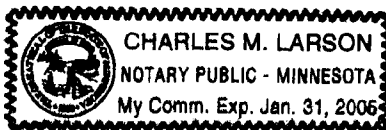
Subscribed to and sworn to before me
this 31 day of July, 2003.

Charles M. Larson

Notary Public

My commission expires:

1/31/05



CERTIFICATE OF SERVICE

I, Daniel Ladmirault, an employee in the law offices of Lukas, Nace Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, sent by U.S. Mail, a copy of the foregoing E911 Quarterly Report of Rural Cellular Corporation (for itself and its affiliates) to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, DC 20554

David Solomon, Chief*
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-C723
Washington, D.C. 20554

Blaise Scinto, Acting Chief*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C133
Washington, DC 20554

Jennifer Tomchin, Legal Advisor*
Policy Division
Wireless Telecommunications Bureau
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Washington, DC 20554

Patrick Forster*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A104
Washington, DC 20554

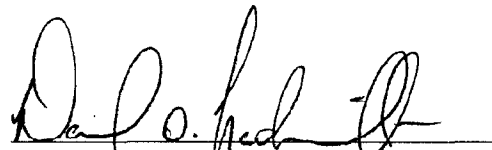
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422 Beecher Rd.
Columbus, OH 43230

Evelyn Bailey, Executive Director, NASNA
Vermont Enhanced 9-1-1 Board
94 State Street
Drawer 20
Montpelier, VT 05620-6501



Daniel Ladmirault

*By Hand-Delivery